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June 10, 1999

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OFFICE OF THE
EXECUTIVE SECRETARY

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

RE: Docket Number 99-00299, BTI Telecommunications IntraLATA Toll
Dialing Parity Implementation Plan

Dear Mr. Waddell:

Enclosed please find the original and 13 copies of Business Telecom, Inc.'s (BTI) IntraLATA Toll Dialing Parity Plan. BTI will comply with all rules of the Federal Communications Commission and the Tennessee Regulatory Authority in implementing its plan.

I am enclosing one additional copy of the filing, to be file-stamped and returned. If you have any questions regarding this filing please contact me at 800-849-9100, extension 7325.

If you have any questions regarding this matter please contact me on 919-863-7325 or 800-849-9100, ext. 7325.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Houck". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jean Houck
Regulatory Affairs

Enclosures

INTRALATA TOLL DIALING PARITY PLAN

**BUSINESS TELECOM, INC.
4300 Six Forks Road
Raleigh, NC 27609**

June 10, 1999

Business Telecom, Inc.

IntraLATA Toll Dialing Parity Plan

I. Purpose

In compliance with the FCC's Order 99-54, Business Telecom, Inc. ("BTI") files its plan for implementing intraLATA toll dialing parity in the areas of Tennessee in which it is certified to provide local exchange service.

The intent of this Plan is to provide customers the ability to pre-select the telecommunications carrier of their choice for completing 1+ intraLATA toll calls without the use of access codes.

II. Implementation Schedule

BTI will offer intraLATA toll dialing parity to its customers in Tennessee by July 22, 1999. At that time, BTI's retail customers may choose any participating interexchange carrier. Currently, BTI is reselling BellSouth Telecommunications service in the following exchanges: Chattanooga, Cleveland, Dayton, Jasper, Bulls Gap, Clinton, Concord, Dandridge, Gatlinburg, Kingston, Knoxville, La Follette, lake City, Lenoir City, Loudon, Maryville, Morristown, Newport, Oak Ridge, Oliver Springs, Sevierville, Sweetwater, Jackson, Memphis, Union City, Ashland City, Centerville, Clarksville, Columbia, Franklin, Gallatin, Goodlettsville, Greenbrier, Hendersonville, Lawrenceburg, Lewisburg, Lyles, Manchester, Mount Pleasant, Murfreesboro, Nashville, Pleasant View, Pulaski, Shelbyville, Smyrna, Springfield, Tullahoma, White House, and Winchester. Exhibit A is a listing of all BellSouth exchanges in which BTI may offer intraLATA toll dialing parity.

III. Carrier Selection Procedures

BTI will implement the full 2-PIC carrier selection methodology. With the full 2-PIC methodology, customers will be able to presubscribe to one telecommunications carrier for interLATA toll calls and presubscribe to the same or a different participating telecommunications carrier for intraLATA toll calls.

Processes will be established to provide new customers with an opportunity to choose their intraLATA toll carrier. Company employees who communicate with the public, accept orders and serve in customer service capacities will be trained to explain the availability of 2-PIC intraLATA toll dialing parity, and to assist customers in making an initial

PIC choice or in changing a PIC choice for intraLATA and interLATA toll calls.

Existing Customers

On July 22, 1999, BTI's retail customers may presubscribe to any IXC that is a participating carrier. An existing customer who does not make a choice for an intraLATA PIC will default to BTI for their intraLATA 1+ and 0+ toll calls. Customers may communicate their choice of carriers directly to BTI or indirectly through their selected carriers.

New Customers

Customers who contact BTI requesting new telephone exchange service will be informed of the opportunity to choose both an intraLATA carrier and an interLATA carrier for their toll calls. If requested by the customer, BTI will provide a list of telecommunications carriers that are available to provide intraLATA toll service in their exchange. The list of intraLATA toll carriers will be presented to customers in a competitively neutral manner.

Customers will be able to make a "no-PIC" selection, but will be unable to make intraLATA toll calls on a 1+ or 0+ dialed basis.

IV. Access to Operator Services and Directory Assistance

Access to Operator Services and Directory Assistance will continue to be available through the customer's local exchange carrier or interLATA carrier. For Operator Services, customers dial "0" to reach their local exchange operator and "00" to reach their interLATA operator. For Directory Assistance, customers dial "1-411" for accessing the local exchange Directory Assistance and customers dial "1-NPA-555-1212" for accessing interLATA Directory Assistance.

V. PIC Change Charge

Any intraLATA or interLATA PIC change made by a new or existing customer after the initial selection (period of 90 days from implementation) will be subject to a \$5.00 nonrecurring charge for each change made.

A charge will be established for "slamming" or unauthorized PIC changes submitted by carriers or BTI for end-user customers. BTI will be subject to the rules related to slamming as indicated in Tennessee Regulatory Authority Rule 1220-4-2-.56, Sections (2)-(6).

VI. CUSTOMER NOTIFICATION

Customers will be notified of the availability of intraLATA toll dialing parity via direct mail no later than June 22, 1999. A copy of BTI's customer notification is attached as Exhibit B.

VII. CARRIER NOTIFICATION

Interexchange carriers will be notified of intraLATA equal access implementation by letter prior to the proposed implementation date. Carriers should provide a list of exchanges in which they plan to offer intraLATA toll service in advance of BTI's implementation date. Interexchange carriers who enter the market after implementation will be added to the list of participating carriers within 30 days of notifying BTI.

EXHIBIT A

LATA	EXCHANGE
Chattanooga	Apison, Benton, Charleston, Chattanooga, Cleveland, College Station, Collegedale, Copper Basin, Dayton, Decatur, Dunlap, Fall Creek Falls, Georgetown, Jasper, Nine Mile, Ooltewah, Pikeville, Soddy-Daisy, South Pittsburg, Spring City, Whitwell
Knoxville	Athens, Ball Play, Bulls Gap, Claxton, Clinton, Coker Creek, Concord, Dandridge, Deer Lodge, Englewood, Etowah, Gatlinburg, Greenback, Halls Cross Roads, Harriman, Huntsville, Jefferson City, Jellico, Kingston, Knoxville, La Follette, Lake City, Lenoir City, Loudon, Macsot-Strawberry Plains, Madisonville, Maryville, Maynardville, Morristown, Newport, New Tazewell, Niota, Norris, Oakdale, Oak Ridge, Oliver Springs, Oneida, Petros, Powell, Riceville, Robbins, Rockwood, Rogersville, Rutledge, Sevierville, Sharps Chapel, Sneedville, Sunbright, Surgoinsville, Sweetwater, Tate Springs, Tellico Plains, Vonore, Wartburg, Washburn, White Pine
Memphis	Adamsville, Alamo, Arlington, Atwood, Bells, Bethel Springs, Big Sandy, Bolivar, Bradford, Brazil, Brownsville, Bruceton, Camden, Cedar Grove, Chulahoma, Collierville, Covington, Decaturville, Dresden, Drummonds, Dyer, Dyersburg, Friendship, Gibson, Gleason, Grand Junction, Greenfield, Halls, Henderson, Henning, Henry, Hornbeak, Humboldt, Huntington, Jackson, Kenton, Latham, Lexington, Martin, Mason, Mason Hall, Maury City, McKenzie, Medina, Memphis, Mercer, Middleton, Milan, Milledgeville, Millinton, Moscow, Munford, New Bern, Palmersville, Paris, Parson, Pinson, Ridgely, Ripley, Rosemark, Rutherford, Sardis, Savannah, Scotts, Selmer, Sharon, Shelby Forest, Shiloh, Sidonia, Somerville, South Hazel, Stanton, Tiptonville, Trenton, Trezevant, Trimble, Troy, Union City, Whiteville, Yorkville
Nashville	Adams-Cedar Hill, Alexandria, Ashland City, Baxter, Beech Grove Coffee C, Beersheba, Belfast, Bethpage, Blanche, Byrdstown, Carthage, Celina, Centertown, Centerville, Chapel Hill, Charlotte, Chestnut Mound, Clarkrange, Clarksville, Clifton, College Grove, Collinwood, Columbia, Cookeville, Cookeville South, Cornersville, Crawford, Cross Plains-Orlinda, Crossville, Culleoka, Cumberland City, Cunningham, De Rossett, Defeated, Dibrell, Dickson, Dover, Doyle, Eagleville, Elkton, Erin, Estill Springs, Ethridge, Fair View, Fayetteville, Flat Creek, Flintville, Fosterville, Franklin, Fredonia, Gainesboro, Gallatin, Goodlettsville, Gordonsville, Granville, Greenbrier, Green Grove, Hampshire, Hartsville, Hendersonville, Highland, Hillsboro, Hillsdale, Hohenwald, Huntland, Jamestown, Laager, Lafayette, Lavergne, Lawrenceburg, Lebanon, Leoma, Lewisburg, Liberty, Linden, Livingston, Lobelville, Loretto, Lyles, Lynchburg, Lynnville, McBurg, McEwen, McMinnville, Manchester, Milton, Minor Hill, Monteagle, Monterey, Moss, Mount Juliet, Mount Pleasant, Murfreesboro, Nashville, New Johnsonville, Nolensville, Norene, Normandy, North Springs, Oak Grove, Old Hickory, Old Zion, Palmyra, Pelham, Petersburg, Pleasant Hill, Pleasant Shade, Pleasant View, Portland, Prospect, Pulaski, Red Boiling Springs, Rickman, Rock Island, Saint Joseph, Sango, Santa Fe, Sewanee, Shelbyville, Smithville, Smyrna, South Oak Grove, Sparta, Spencer, Springfield, Spring Hill, Summertown, Tansi, Temperance Hall, Tennessee Ridge, Tracy City, Trune, Tullahoma, Unionville, Vanleer, Viola, Wartrace, Watertown, Waverly, Waynesboro, West Vanleer, Westmoreland, White Bluff, White House, Williamsport, Winchester, Woodbury, Woodland

EXHIBIT B

Date

Dear Valued Customer,

The purpose of this letter is to inform you that BTI is making intraLATA (Local Access and Transport Area) toll subscription available to our local service customers. This gives you the opportunity to choose an alternate carrier to complete your intraLATA toll calls. These are long distance calls made within your calling zone. For more information on your calling zone, please refer to the white pages directory for your area.

BTI currently completes your intraLATA toll calls and local area code directory assistance, and will continue to do so unless you choose otherwise.

If you elect to choose an alternate provider, you should call the business office of the company you have selected to ensure your account is properly established.

Changes you may choose to make for this specific service will not impact your BTI local service nor the long distance company you utilize for long distance calls outside the state or between calling areas. In addition, changes will have no effect on the size or the geographic areas covered by your current LATA.

As always, we are grateful for your continued business. If you have any questions, please contact our Customer Service Center at 1-800-849-2111.

Sincerely,